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12 *Attorneys for Defendants AMG Services, Inc.*
13 *and MNE Services, Inc. (dba Tribal Financial*
14 *Services, Ameriloan, UnitedCashLoans,*
15 *USFastCash)*

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMG SERVICES, INC., *ET AL.*,

Defendants, and

PARK 269 LLC, *ET AL.*,

Relief Defendants.

Case No.: 2:12-CV-536-GMN-(VCF)

**DEFENDANTS' MOTION FOR LEAVE
TO FILE DOCUMENTS
UNDER SEAL**

1 Pursuant to Local Rule 10-5(b) and the Amended Confidentiality and Protective Order in
2 this case (ECF No. 308), AMG Services, Inc., SFS, Inc., Red Cedar Services, Inc., and MNE
3 Services, Inc. move this court for leave to file under seal the following documents: *Defendants’*
4 *Opposition to the FTC’s Motion for Summary Judgment* and accompanying exhibits (ECF No.
5 493), *Defendants’ Statement of Disputed Facts in Opposition to the FTC’s Motion for Summary*
6 *Judgment* (ECF No. 494), and *Defendants’ Rule 56(c)(2) Objection to FTC Evidence, or in the*
7 *Alternative, Rule 56(d) Motion for Additional Discovery* (ECF No. 498). In support of this
8 motion, defendants state as follows:
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10 1. On January 11, 2013, this Court entered an amended protective order permitting
11 parties to designate documents and testimony as confidential, and to submit such information to
12 the Court under seal. (ECF No. 308, at 5 (“[F]or Confidential Information attached to or
13 included in dispositive motions, the moving party(ies) must articulate compelling reasons
14 supported by specific facts demonstrating that sealing the document outweighs the public’s
15 interest in disclosure”).)

17 2. Many of the exhibits accompanying *Defendants’ Opposition to the FTC’s Motion*
18 *for Summary Judgment* contain consumer data or business information designated “confidential”
19 by the FTC or defendants.
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21 3. The *Defendants’ Opposition to the FTC’s Motion for Summary Judgment*,
22 *Defendants’ Statement of Disputed Facts in Opposition to the FTC’s Motion for Summary*
23 *Judgment*, and *Defendants’ Rule 56(c)(2) Objection to FTC Evidence, or in the Alternative, Rule*
24 *56(d) Motion for Additional Discovery* contain repeated references to the exhibits designated
25 “confidential.”
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4. In an abundance of caution, defendants seek leave of Court to file both the exhibits and the briefs they accompany under seal.

Accordingly, defendants respectfully ask the Court to grant their motion to file under seal *Defendants' Opposition to the FTC's Motion for Summary Judgment* and accompanying exhibits (ECF No. 493), *Defendants' Statement of Disputed Facts in Opposition to the FTC's Motion for Summary Judgment* (ECF No. 494), and *Defendants' Rule 56(c)(2) Objection to FTC Evidence, or in the Alternative, Rule 56(d) Motion for Additional Discovery* (ECF No. 498).

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 12-5-2013

Dated: December 3, 2013

/s/ David J. Merrill
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13 *Inc., dba Tribal Financial Services,*

14 *Ameriloan, UnitedCashLoans, USFastCash*

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on the 3rd day of December 2013, I submitted the foregoing *Defendants' Motion for Leave To File Documents Under Seal* electronically for filing and service with the United States District Court of Nevada. Service of the foregoing document shall be made to all counsel of record via electronic case filing.

/s/ Bradley H. Weidenhammer